

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Criminal Case Nos. 08CR0824-BTM
)
Plaintiff,)
)
v.)
)
SALVADOR ALONSO-ALDAMA) DECLARATION IN SUPPORT OF
) OPPOSITION TO DEFENDANT'S MOTION
) FOR RECONSIDERATION OF SENTENCE
Defendants.)
)

I, GREGORY MARK HARRISON, do declare:

1. I am a Deportations Officer with Immigration and Customs Enforcement. I have been a Deportations Officer for the past two years. Prior to that, from 1998 through 2006, I was employed as an Enforcement Officer with Customs and Border Protection, assigned to the San Ysidro Port of Entry. Prior to that, from 1990 through 1998, I was employed as an Immigration Inspector, Special Operations Inspector and Senior Immigration Inspector at the San Ysidro Port of Entry with INS/CBP. In 1989, I was employed as a Border Patrol Agent.

2. I am very familiar with the Central Index System (CIS), and the Deported Alien Control System (DACS). I use these computer databases daily, and have done so since 1989. I am familiar with how to use these systems and what information they contain. Generally, they are used to document any individual who applies for an immigration benefit or any individual who has been deported or encountered by the various federal agencies which enforce immigration law. I am also familiar with A-Files, which are files which contain

1 documents related to an individual's immigration status, such as
2 deportation orders, visa applications, etc.

3 3. At the request of Assistant U.S. Attorney John Parmley, I
4 queried the CIS and DACS databases and requested information about
5 the A-File for Salvador Alonso-Aldama (Date of Birth 8/16/1956, A-File
6 Numbers A-22943080 and A-24229331) in an attempt to learn whether he
7 had been deported after being convicted and sentenced in 1987 for a
8 drug trafficking felony.

9 4. According to Immigration and Customs Enforcement Records,
10 Alonso-Aldama had two A-Files which were merged together into a single
11 file. This A-File is currently lost. His first A-File was opened in
12 the CIS in October of 1977. His second A-File was opened in the CIS
13 in May of 1981. At some point after 1981 the files were merged
14 together. After 1999, the file was lost. It is impossible to know
15 precisely when and where this A-File went missing.

16 5. However, I have also checked the CIS and DACS databases to
17 learn whether Alonso-Aldama has been deported or removed to Mexico
18 since his sentencing on May 11, 1987. Between 1980 and 1981 the
19 precursor database to DACS was first used. Beginning in 1983 or 1984
20 the DACS database was used to store relevant immigration information.
21 I have found no record of any deportation or removal since May 11,
22 1987. Based on my experience with these databases, I would expect to
23 see that information displayed. In other words, had he been deported,
24 there would be dates showing when he had been served with deportation
25 orders, appearances before immigration judges, as well as dates and
26 places of removal. Additionally, I would expect to see what charges
27 he had been removed or deported under, whether he was granted a
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1 voluntary return to his country of origin, whether he filed an appeal,
2 etc. None of that information is present in DACS or CIS. In reality,
3 there are no entries at all under either A-Number in DACS. In other
4 words, while there is a DACS database entry associated with Alonso-
5 Aldama, it contains no references to any immigration proceedings,
6 deportations, removals, charges, etc. Therefore, based on my training
7 and experience, and the files and records of this case, the evidence
8 shows that Salvador Alonso-Aldama has not been deported or removed
9 from the United States since May of 1987.

10 6. I declare under penalty of perjury under the laws of the
11 United States that the foregoing is true and correct.

12 Executed the 5th of August 5, 2008, at San Diego, California.

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15 GREGORY MARK HARRISON
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